

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



FILED
9-12-16
04:59 PM

Application of Southern California Edison
Company (U338E) for Approval of its Energy
Savings Assistance and California Alternate
Rates for Energy Programs and Budgets for
Program Years 2015-2017

A.14-11-007
(Filed November 18, 2014)

And Related Matters.

A.14-11-009
A.14-11-010
A.14-11-011

**THE OFFICE OF RATEPAYER ADVOCATES
NOTICE OF EX PARTE COMMUNICATION**

Pursuant to Rule 8.4 of the California Public Utilities Commission's ("Commission") Rules of Practice and Procedure, the Office of Ratepayer Advocates ("ORA") respectfully submits this notice of ex parte communication in the above referenced proceedings. The meeting was held on Friday, September 9, 2016 at 11:30 am with Dave Gamson, Chief of Staff of Commissioner Carla Peterman, and Jennifer Kalafut, Advisor to Commissioner Carla Peterman, at the California Public Utilities Commission offices in San Francisco. The meeting was initiated by ORA to discuss the Proposed Decision ("PD") and the Alternate Proposed Decision ("APD") on the Energy Savings Assistance ("ESA") program and the California Alternate Rates for Energy ("CARE") program. ORA representatives present were Policy Analyst Dan Buch, Policy and Communications Advisor Cheryl Cox, and Attorney Zhen Zhang.

ORA discussed the following:

- ORA supports adopting the Energy Savings Assistance Cost Effective Test ("ESACET") threshold target of 1.0 as it incorporates energy savings and the benefits of health, comfort and safety of ESA measures. Refinement of metrics will occur in the future, but should not delay the adoption of the threshold target today.

- ORA supports changes to the administrative rules (e.g. the Three Measure Rule and the Go Back Rule). The Commission should eliminate the Three Measure Rule only if it adopts the ESACET threshold target of 1.0. ORA supports phasing out the Go Back Rule with tailored strategies for repeat service households.
- ORA supports higher targets because the proposed targets in the APD are lower than what was proposed in the Utilities' applications.
- ORA supports extending the current ESA and CARE program cycles to 2019, by extending 2018 funding levels for one year.
- The PD should remove the requirement that customers approaching 400 percent of baseline usage participate in ESA.
- The APD should remove the requirement that customers participate in dynamic pricing or demand response to receive ESA. Customers should be able to choose the rate plan that best fits their needs.
- With regards to the APD, ESA money should not be used for common areas without a mechanism to ensure that low income residents receive the benefits.
- Unspent funds are ratepayer funds. Unspent funds should be returned to ratepayers to offset future years' collections.

Respectfully submitted,

/s/ ZHEN ZHANG

Zhen Zhang

Attorney for
The Office of Ratepayer Advocates

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Telephone: (415) 703-2310
Email: Zhen.Zhang@cpuc.ca.gov

September 12, 2016